

Kami E. Quinn
Gilbert LLP
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THIRTY-FIFTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant:	Gilbert LLP
Authorized to provide professional services to:	Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019 (Docket #553)
Period for which compensation and reimbursement is sought:	August 1, 2022 through August 31, 2022
Amount of compensation sought as actual, reasonable, and necessary:	\$394,192.00 (80% of \$492,740.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$6,353.59 (100%)
This is a:	Monthly Fee Statement

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this thirty-fifth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing August 1, 2022 through August 31, 2022 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$492,740.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$394,192.00.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$811.65. The blended hourly rate of paraprofessionals during the Application Period is \$280.51.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$1,819.09 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$1,819.09.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$4,534.50. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

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WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$394,192.00 (80% of \$492,740.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$6,353.59 (100%), for a total amount of \$400,545.59 for the Application Period.

Dated: October 12, 2022
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

Kami E. Quinn
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	4.6	\$920.00
A009	Meetings / Communications with AHC & Creditors	4.8	\$8,640.00
A015	Non-Working Travel (Billed @ 50%)	17.2	\$6,638.00
A019	Plan of Reorganization / Disclosure Statement	8.0	\$14,400.00
A020	Insurance Adversary Proceeding	619.6	\$462,142.00
		654.2	\$492,740.00

Exhibit B

Summary of Compensation by Professional

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Partner / District of Columbia – 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade – 1984 U.S. Supreme Court – 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation – 2017 U.S. Court of Federal Claims – 2019	\$1,800	12.8	\$23,040.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,450	41.5	\$60,175.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,450	75.2	\$109,040.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$850 \$425 ²	93.3 11.6	\$79,305.00 \$4,930.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$700	76.5	\$53,550.00
Adam Farra	Associate / State of Maryland – 2011 District of Columbia – 2015	\$710	9.0	\$6,390.00
Sarah Sraders	Associate / State of New York – 2016 District of Columbia – 2017	\$660	48.6	\$32,076.00
Alison Gaske	Associate / District of Columbia – 2016	\$610 \$305 ²	77.0 5.6	\$46,970.00 \$1,708.00
Janet Sanchez	Associate / Commonwealth of Virginia - 2020	\$475	28.4	\$13,490.00
Ifenanya Agwu	Associate / District of Columbia – 2022	\$420	47.4	\$19,908.00
December Huddleston	Associate / District of Columbia – 2021	\$420	32.3	\$13,566.00
John Girgenti	Staff Attorney / State of New York – 2002 District of Columbia – 2007	\$365	23.0	\$8,395.00
Blair Hubbard	Director of Analytics – Joined firm in 2021	\$425	5.4	\$2,295.00
Alyssa Bonesteel	eDiscovery & Policy Review Coordinator– Joined firm in 2018	\$375	8.5	\$3,187.50
Sherley Martinez	Paralegal – Joined firm in 2017	\$325	7.2	\$2,340.00
Nick Poz	Paralegal – Joined firm in 2022	\$325	15.7	\$5,102.50
Sara Ogrey	Paralegal – Joined firm in 2019	\$240	5.8	\$1,392.00

² Non-working travel is billed @ 50% of regular hourly rate.

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Carmen Turner	Project Assistant – Joined firm in 2021	\$200	29.4	\$5,880.00
	Totals		654.2	\$492,740.00
	Attorney Blended Rate	811.65		
	Paraprofessional Blended Rate	\$280.51		

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

DESCRIPTION	Total Expenses for Period
Travel – Lodging	\$303.60
Travel – Meals	\$41.87
Travel – Mileage	\$404.38
Travel – Parking	\$65.95
Travel – Taxi Fare	\$100.68
Travel – Tolls	\$6.61
Travel – Train Fare	\$896.00
Total	\$1,819.09

Exhibit D

Summary of Expenses Incurred and Not Yet Paid

SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID

DESCRIPTION	Total Expenses for Period
Insurance Consulting Expert A	\$4,534.50
Total	\$4,534.50

Exhibit D

Time and Expense Detail



700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

September 22, 2022
Invoice Number: 11327911
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2022

Re: Ad Hoc Committee (Purdue)

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	492,740.00	1,819.09	494,559.09
Total	492,740.00	1,819.09	494,559.09

TOTAL FEES \$ 492,740.00

TOTAL EXPENSES \$ 1,819.09

TOTAL FEES AND EXPENSES \$ 494,559.09

FOR PROFESSIONAL SERVICES RENDERED through August 31, 2022

Purdue Bankruptcy

A004: Case Administration

Name	Date	Services	Hours	Amount
Turner, C.	8/01/22	Review court docket for recent filings.	.90	180.00
Turner, C.	8/08/22	Review court docket for recent insurance-related filings.	.90	180.00
Turner, C.	8/08/22	Update case calendar re omnibus hearing dates and case-related deadlines.	.50	100.00
Turner, C.	8/15/22	Review court docket for pleadings recently filed.	.90	180.00
Turner, C.	8/22/22	Review court docket for recent filings.	.90	180.00
Turner, C.	8/29/22	Review court docket for recently filed pleadings in case.	.50	100.00
Project Total:			4.60	\$ 920.00

A009: Meetings / Communications with AHC & Creditors

Name	Date	Services	Hours	Amount
Gilbert, S.	8/16/22	Confer with AHC working group re strategy.	1.00	1,800.00
Gilbert, S.	8/18/22	Confer with AHC working group re strategy options.	1.00	1,800.00
Gilbert, S.	8/23/22	Confer with AHC re strategy.	1.00	1,800.00
Gilbert, S.	8/29/22	Correspond with AHC re plan issues.	.30	540.00
Gilbert, S.	8/31/22	Confer with AHC working group re strategy.	1.50	2,700.00
Project Total:			4.80	\$ 8,640.00

A015: Non-Working Travel (Billed @ 50%)

Name	Date	Services	Hours	Amount
Rubinstein, J.	8/29/22	Travel from Potomac, MD to Stamford, CT for deposition preparation session with co-counsel.	5.80	2,465.00
Rubinstein, J.	8/30/22	Travel from Stamford, CT to Potomac, MD.	5.80	2,465.00
Gaske, A.	8/30/22	Travel from Washington, DC to Stamford, CT for deposition preparation session with co-counsel.	4.00	1,220.00
Gaske, A.	8/31/22	Travel from Stamford, CT to Washington, DC after attending deposition preparation session.	1.60	488.00
Project Total:			17.20	\$ 6,638.00

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A019: Plan of Reorganization / Disclosure Statement

Name	Date	Services	Hours	Amount
Gilbert, S.	8/10/22	Confer with K. Eckstein re strategy options.	1.00	1,800.00
Gilbert, S.	8/12/22	Confer with Davis Polk re strategy options (1.0); confer with S. Birnbaum re same (1.0).	2.00	3,600.00
Gilbert, S.	8/16/22	Analysis re NOAT issues.	1.00	1,800.00
Gilbert, S.	8/17/22	Confer with K. Eckstein re strategy.	.50	900.00
Gilbert, S.	8/18/22	Confer with K. Eckstein re strategy.	.50	900.00
Gilbert, S.	8/24/22	Confer with personal injury claimtants re plan issues.	.40	720.00
Gilbert, S.	8/26/22	Confer with Sackler representatives re plan issues.	1.30	2,340.00
Gilbert, S.	8/29/22	Confer with K. Eckstein re strategy.	.80	1,440.00
Gilbert, S.	8/31/22	Review materials re plan options.	.50	900.00
Project Total:			8.00	\$ 14,400.00

A020: Insurance Adversary Proceeding

Name	Date	Services	Hours	Amount
Shore, R.	8/01/22	Review agenda for August 4 call (0.9); analysis re data sources (0.5); confer with R. Leveridge and J. Rubinstein re strategy (0.7); review Insurer #15 policy language (0.4); confer with J. Rubinstein re same (0.5).	3.00	4,350.00
Girgenti, J.	8/01/22	Review documents for upcoming depositions.	2.00	730.00
Rubinstein, J.	8/01/22	Analysis re Debtors' Rule 30(b)(6) topic 15 issue (1.8); review edits to draft deposition protocol (0.5); confer with R. Leveridge and R. Shore re strategy (0.7); correspond with co-counsel and insurer defendants re scheduling order (0.3); revise offensive Rule 30(b)(1) outline (2.8); communicate with team re expert retention letter (0.2); confer with R. Shore re multiple open strategy issues (0.5).	6.80	5,780.00
Rush, M.	8/01/22	Communicate with D. Huddleston re review of Marsh documents.	.10	70.00
Gaske, A.	8/01/22	Correspond with J. Rubinstein re certain insurer policy stipulation versions.	.30	183.00
Gaske, A.	8/01/22	Analyze J. Rubinstein edits to deposition outline (0.3); review documents produced by Insurer #23 re deposition preparation (1.9).	2.20	1,342.00

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Name	Date	Services	Hours	Amount
Leveridge, R.	8/01/22	Confer with R. Shore and J. Rubinstein re various litigation issues (0.7); review status of retention of potential expert (0.4); review agenda for co-counsel meeting (0.9); review communications with co-counsel re schedule and discovery issues (0.9).	2.90	4,205.00
Farra, A.	8/01/22	Draft analysis re Rule 30(b)(6) issue.	7.40	5,254.00
Huddleston, D.	8/01/22	Continue reviewing documents for defensive depositions.	7.00	2,940.00
Agwu, I.	8/01/22	Review documents in preparation for upcoming deposition.	4.10	1,722.00
Poz, N.	8/01/22	Communicate with J. Rubinstein and A. Gaske re Insurer #15 insurance policies.	.10	32.50
Shore, R.	8/02/22	Confer with R. Leveridge and J. Rubinstein re expert retention issues (0.4); analysis re Insurer #15 issues (0.6).	1.00	1,450.00
Girgenti, J.	8/02/22	Review and identify documents for upcoming depositions.	2.50	912.50
Rubinstein, J.	8/02/22	Analysis re data sources (0.7); confer with A. Gaske re policy analysis (0.2); confer with A. Gaske re offensive deposition preparation (0.5); analysis re Insurer #15 settlement (1.5); confer with A. Farra re same (0.5); review collections of documents identified as potentially relevant to offensive depositions (0.7); investigate potential expert witness (0.6); confer with R. Leveridge and R. Shore re same (0.4).	5.10	4,335.00
Sanchez, J.	8/02/22	Review documents in preparation for defensive depositions.	1.80	855.00
Rush, M.	8/02/22	Review Marsh documents marked as responsive in preparation for upcoming depositions.	3.20	2,240.00
Rush, M.	8/02/22	Communicate with co-counsel re Navigators depositions.	.20	140.00
Martinez, S.	8/02/22	Confer with A. Gaske re policy review.	.10	32.50
Gaske, A.	8/02/22	Confer with J. Rubinstein re policy analysis (0.2); confer with S. Martinez re same (0.1).	.30	183.00
Gaske, A.	8/02/22	Confer with J. Rubinstein re deposition preparation (0.5); revise deposition outline for Insurer #23 pursuant to J. Rubinstein edits (2.2); complete review of J. Lowne deposition (2.7); review portion of R. O'Connor deposition (0.6).	6.00	3,660.00
Leveridge, R.	8/02/22	Confer with R. Shore and J. Rubinstein re expert issues.	.40	580.00
Farra, A.	8/02/22	Confer with J. Rubinstein re Insurer #15 settlement issue.	.50	355.00

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Name	Date	Services	Hours	Amount
Turner, C.	8/02/22	Update case calendar re Marsh witness deposition.	.10	20.00
Turner, C.	8/02/22	Review and organize third-party subpoenas.	.60	120.00
Huddleston, D.	8/02/22	Continue reviewing documents for defensive depositions.	5.10	2,142.00
Agwu, I.	8/02/22	Continue reviewing documents in preparation for upcoming deposition.	7.90	3,318.00
Shore, R.	8/03/22	Confer with J. Rubinstein re Insurer #15 issues (0.5); analysis re same (0.9); analysis re Issue #27 investigation (0.6).	2.00	2,900.00
Girgenti, J.	8/03/22	Review documents for upcoming depositions.	2.00	730.00
Rubinstein, J.	8/03/22	Analysis re Insurer #15 settlement (2.5); confer with R. Shore re same (0.5); analysis of key policy terms (0.4); confer with A. Gaske and B. Hubbard re same (0.8); review correspondence re procedure for retaining potential experts (0.2); review correspondence with co-counsel re various document reviews in preparation for Debtors' and Marsh depositions (0.5); analysis of complaint (0.6); review significant documents identified re deposition preparation (0.7).	6.20	5,270.00
Sanchez, J.	8/03/22	Review documents in preparation for defensive depositions.	2.80	1,330.00
Rush, M.	8/03/22	Continue reviewing documents marked as responsive in preparation for depositions.	4.30	3,010.00
Martinez, S.	8/03/22	Review and organize materials re Consulting Expert A retainer agreement.	.20	65.00
Martinez, S.	8/03/22	Review databases for policies listed in Insurer #15 settlement agreement.	1.60	520.00
Gaske, A.	8/03/22	Review databases for certain policies issued by Insurer #15.	.80	488.00
Gaske, A.	8/03/22	Review certain policy information re migration to policy database.	1.50	915.00
Gaske, A.	8/03/22	Confer with J. Rubinstein and B. Hubbard re policy review software.	.80	488.00
Leveridge, R.	8/03/22	Communicate with co-counsel re expert retention (0.7); review bankruptcy proceeding orders re same (0.4).	1.10	1,595.00
Sraders, S.	8/03/22	Review draft retention letter for proposed expert.	.70	462.00
Hubbard, B.	8/03/22	Confer with J. Rubinstein and A. Gaske re potential policy review.	.80	340.00
Huddleston, D.	8/03/22	Continue reviewing documents for defensive depositions.	7.20	3,024.00

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Name	Date	Services	Hours	Amount
Agwu, I.	8/03/22	Continue reviewing documents in preparation for upcoming deposition.	7.80	3,276.00
Shore, R.	8/04/22	Confer with co-counsel re key issues and experts (1.9); review issue list from A. Crawford (1.2); review and revise consultant/expert retention letter (0.4); communicate with co-counsel re same (0.4); confer with team re case status and strategy (0.6).	4.50	6,525.00
Girgenti, J.	8/04/22	Continue reviewing documents for upcoming depositions.	1.20	438.00
Girgenti, J.	8/04/22	Confer with team re case update.	.60	219.00
Rubinstein, J.	8/04/22	Analysis of documents relevant to upcoming depositions (1.5); update task list (0.4); confer with team re strategy and open tasks (0.6); review proposed edits re expert retention agreement (0.2); confer with co-plaintiffs' counsel, R. Leveridge, and R. Shore re case strategy (1.9).	4.60	3,910.00
Sanchez, J.	8/04/22	Confer with team re status and next steps.	.60	285.00
Rush, M.	8/04/22	Review Debtors' documents marked responsive in preparation for upcoming depositions.	4.20	2,940.00
Rush, M.	8/04/22	Review memorandum re Issue #34.	.50	350.00
Rush, M.	8/04/22	Confer with team re case status and strategy.	.60	420.00
Martinez, S.	8/04/22	Confer with team re case status and strategy.	.60	195.00
Bonesteel, A.	8/04/22	Confer with team re case update.	.60	225.00
Bonesteel, A.	8/04/22	Review third-party production from FDA.	.30	112.50
Gaske, A.	8/04/22	Confer with team re litigation strategy and status.	.60	366.00
Gaske, A.	8/04/22	Review certain documents produced by Debtors in preparation for upcoming deposition.	.40	244.00
Gaske, A.	8/04/22	Analyze policy language documents re policy review platform.	1.10	671.00
Leveridge, R.	8/04/22	Review edits to expert retainer letter (0.3); communicate with co-counsel re same (0.3).	.60	870.00
Leveridge, R.	8/04/22	Confer with team re litigation update and strategy.	.60	870.00
Leveridge, R.	8/04/22	Analyze litigation strategy (1.0); confer with co-counsel re same (1.9).	2.90	4,205.00
Farra, A.	8/04/22	Confer with team re litigation update.	.60	426.00
Sraders, S.	8/04/22	Analyze Issue #27.	.80	528.00
Sraders, S.	8/04/22	Confer with team re strategy and recent developments.	.60	396.00
Sraders, S.	8/04/22	Confer with co-counsel re case strategy.	1.90	1,254.00
Sraders, S.	8/04/22	Analyze expert retention issues.	1.90	1,254.00
Sraders, S.	8/04/22	Research re Issue #34.	.70	462.00

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Name	Date	Services	Hours	Amount
Turner, C.	8/04/22	Confer with team re litigation strategy and case update.	.60	120.00
Hubbard, B.	8/04/22	Confer with team re status and strategy.	.60	255.00
Hubbard, B.	8/04/22	Review policy review materials for inclusion in database.	1.50	637.50
Huddleston, D.	8/04/22	Confer with team re litigation status and strategy.	.60	252.00
Huddleston, D.	8/04/22	Complete review of documents for defensive depositions.	5.80	2,436.00
Agwu, I.	8/04/22	Complete review of documents in preparation for upcoming deposition.	8.20	3,444.00
Agwu, I.	8/04/22	Confer with team re case status and strategy.	.60	252.00
Poz, N.	8/04/22	Confer with team re case status and next steps.	.60	195.00
Shore, R.	8/05/22	Analyze litigation strategy in preparation for drafting trial plan.	2.00	2,900.00
Girgenti, J.	8/05/22	Communicate with M. Rush re review of Marsh documents.	.10	36.50
Rubinstein, J.	8/05/22	Communicate with team re Marsh deposition preparation (0.3); review insurer proposed edits to revised scheduling order (0.3); revise draft trial plan (1.2); communications with team re strategy (0.3).	2.10	1,785.00
Sanchez, J.	8/05/22	Review documents in preparation for defensive depositions.	3.70	1,757.50
Rush, M.	8/05/22	Review memorandum re Issue #34.	1.10	770.00
Rush, M.	8/05/22	Confer with L. Szymanski re review of Marsh documents.	.20	140.00
Gaske, A.	8/05/22	Confer with B. Hubbard re policy database.	.50	305.00
Gaske, A.	8/05/22	Analyze certain policy provisions re relevant language spreadsheet for policy database.	1.90	1,159.00
Gaske, A.	8/05/22	Draft instructions re policy language spreadsheet for policy database.	.70	427.00
Leveridge, R.	8/05/22	Communicate with team re trial planning.	.40	580.00
Sraders, S.	8/05/22	Analyze bankruptcy court orders re expert expense issues.	1.40	924.00
Hubbard, B.	8/05/22	Confer with A. Gaske re policy review.	.50	212.50
Huddleston, D.	8/05/22	Complete review of documents for defensive depositions.	1.40	588.00
Shore, R.	8/08/22	Analyze Issue #27, litigation planning and related issues.	1.50	2,175.00
Shore, R.	8/08/22	Confer with J. Rubinstein re litigation strategy and related issues.	1.50	2,175.00

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Rubinstein, J.	8/08/22	Review analysis re expert retention process (0.4); review case law re Issue #49 (0.6); confer with I. Agwu re deposition transcript review project (0.8); confer with R. Shore re strategy (1.5); communicate with Debtors' counsel re preparation for Marsh depositions (0.4); correspond with A. Kramer re coverage portfolio and follow up analysis re same (0.4); communicate with P. Breene re open tasks (0.2); analysis re insurer proposed edits to modified case management schedule (0.2); correspond with co-counsel re same (0.4); analysis re adversary complaint (0.6).	5.50	4,675.00
Sanchez, J.	8/08/22	Research evidentiary rules.	2.80	1,330.00
Sanchez, J.	8/08/22	Review policy language analysis documents.	.70	332.50
Rush, M.	8/08/22	Review documents identified as responsive in preparation for upcoming depositions.	1.50	1,050.00
Rush, M.	8/08/22	Review documents identified as responsive in preparation for Debtors' depositions.	4.10	2,870.00
Gaske, A.	8/08/22	Analyze certain policy provisions re relevant language spreadsheet for policy database.	2.80	1,708.00
Leveridge, R.	8/08/22	Communicate with team re experts.	.80	1,160.00
Sraders, S.	8/08/22	Review process for retention of experts in adversary proceeding.	.80	528.00
Sraders, S.	8/08/22	Analysis of Issue #27.	.30	198.00
Sraders, S.	8/08/22	Analysis re trial plan.	.40	264.00
Sraders, S.	8/08/22	Communicate with J. Sanchez re research re admissibility of evidence.	.10	66.00
Sraders, S.	8/08/22	Communicate with J. Rubinstein and R. Leveridge re potential expert.	.30	198.00
Agwu, I.	8/08/22	Confer with J. Rubinstein re deposition transcript review project.	.80	336.00
Agwu, I.	8/08/22	Review J. Lowne deposition transcript.	1.40	588.00
Agwu, I.	8/08/22	Begin reviewing R. O'Connor deposition transcript (2.8); begin drafting summary of deposition (2.7).	5.50	2,310.00
Poz, N.	8/08/22	Review and identify insurance policies for inclusion in database for further analysis.	2.70	877.50

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Rubinstein, J.	8/09/22	Review edits to proposed revised scheduling order (1.3); correspond with co-counsel re same (0.4); correspond with co-counsel re Rule 30(b)(6) errata sheet (0.2); correspond with co-counsel re Marsh deposition preparation (0.4); analysis re Marsh-related document reviews (0.8); confer with S. Sraders re various pending projects (0.5); communicate with team re AGLIC/Steadfast policy stipulation (0.2); analysis re Insurer #15 coverage (1.1); review proposed revisions to expert retention letter (0.2).	5.10	4,335.00
Sanchez, J.	8/09/22	Review policy language.	2.90	1,377.50
Rush, M.	8/09/22	Review documents identified as responsive in preparation for depositions.	3.50	2,450.00
Gaske, A.	8/09/22	Communicate with J. Rubinstein re background on Exhibit A to complaint (0.3); analyze past correspondence re same (1.3).	1.60	976.00
Gaske, A.	8/09/22	Communicate with counsel for AGLIC and Steadfast re policy stipulation (0.3); review underwriting file for Insurer #23 re deposition preparation (0.9).	1.20	732.00
Gaske, A.	8/09/22	Review status of policy language spreadsheet re policy database.	1.60	976.00
Leveridge, R.	8/09/22	Review insurer edits to proposed revised schedule (0.4); revise same (0.4).	.80	1,160.00
Leveridge, R.	8/09/22	Communicate with team re document review.	.30	435.00
Leveridge, R.	8/09/22	Review recent judicial decision (0.2); communications with team re relevance to coverage action (0.2).	.40	580.00
Sraders, S.	8/09/22	Confer with J. Rubinstein re case status and strategy for next steps.	.50	330.00
Sraders, S.	8/09/22	Analyze documents in preparation for upcoming deposition.	1.90	1,254.00
Sraders, S.	8/09/22	Review research re rules of evidence.	.20	132.00
Sraders, S.	8/09/22	Research relevant to trial plan.	.40	264.00
Sraders, S.	8/09/22	Analyze language in policies re Issue #34.	1.20	792.00
Turner, C.	8/09/22	Update case calendar re J. Lowne errata sheet deadline.	.40	80.00
Agwu, I.	8/09/22	Continue reviewing R. O'Connor deposition transcript (2.2); draft summary of same (1.3).	3.50	1,470.00
Poz, N.	8/09/22	Continue reviewing and identifying insurance policies for inclusion in database for further analysis.	2.70	877.50

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Name	Date	Services	Hours	Amount
Shore, R.	8/10/22	Review materials re Issue #27 (0.2); confer with S. Sraders re same (0.8).	1.00	1,450.00
Shore, R.	8/10/22	Review potential expert analysis.	1.50	2,175.00
Rubinstein, J.	8/10/22	Review recent underlying opioid opinion (1.6); continue drafting trial outline (1.3); communicate with co-counsel re deposition preparation (0.4); communicate with team re expert retention letter (0.1).	3.40	2,890.00
Sanchez, J.	8/10/22	Confer with S. Sraders re policy review parameters.	.60	285.00
Sanchez, J.	8/10/22	Review policy language.	.70	332.50
Bonesteel, A.	8/10/22	Review J. Lowne deposition materials.	.70	262.50
Bonesteel, A.	8/10/22	Organize materials from co-counsel for attorney review.	1.80	675.00
Gaske, A.	8/10/22	Communicate with team re policy database project.	.30	183.00
Gaske, A.	8/10/22	Analyze materials re Exhibit A of complaint.	2.10	1,281.00
Sraders, S.	8/10/22	Confer with J. Sanchez re policy language re Issue #34.	.60	396.00
Sraders, S.	8/10/22	Confer with R. Shore re analysis of data in support of Issue #27.	.80	528.00
Sraders, S.	8/10/22	Continue research relevant to trial plan.	1.40	924.00
Sraders, S.	8/10/22	Research re Issue #34.	1.00	660.00
Agwu, I.	8/10/22	Continue reviewing R. O'Connor deposition transcript (1.8); continue drafting summary of same (1.7).	3.50	1,470.00
Poz, N.	8/10/22	Continue reviewing and identifying insurance policies for inclusion in database for further analysis.	2.20	715.00
Shore, R.	8/11/22	Analyze Issues #27, #34 and #32 (1.8); confer with team re case status and strategy (0.4).	2.20	3,190.00
Girgenti, J.	8/11/22	Confer with team re case update.	.40	146.00
Rubinstein, J.	8/11/22	Revise litigation task list (0.5); analysis of documents (0.4); correspond with co-counsel re defensive and third-party deposition preparation (0.2); continue drafting trial outline (2.2); confer with A. Gaske re Insurer #15 policy analysis (0.6); confer with team case status and strategy (0.4).	4.30	3,655.00
Sanchez, J.	8/11/22	Confer with team re status and next steps.	.40	190.00
Rush, M.	8/11/22	Continue review of documents identified as responsive in preparation for depositions.	4.20	2,940.00
Rush, M.	8/11/22	Confer with S. Sraders re insurer depositions.	.30	210.00
Rush, M.	8/11/22	Confer with team re case status and strategy.	.40	280.00
Martinez, S.	8/11/22	Confer with team re case update.	.40	130.00

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Martinez, S.	8/11/22	Review and organize Marsh Rule 30(b)(6) materials.	.50	162.50
Bonesteel, A.	8/11/22	Confer with team re litigation strategy.	.40	150.00
Bonesteel, A.	8/11/22	Review and prepare deposition transcript for attorney review.	.30	112.50
Bonesteel, A.	8/11/22	Review and organize J. Lowne deposition materials.	.40	150.00
Gaske, A.	8/11/22	Confer with team re litigation strategy and next steps.	.40	244.00
Gaske, A.	8/11/22	Confer with J. Rubinstein re Exhibit A to complaint.	.60	366.00
Gaske, A.	8/11/22	Draft portions of Rule 30(b)(1) deposition outline for Insurer #23.	.40	244.00
Gaske, A.	8/11/22	Review materials re Exhibit A to complaint.	.30	183.00
Sraders, S.	8/11/22	Confer with M. Rush re depositions.	.30	198.00
Sraders, S.	8/11/22	Confer with team re recent developments and strategy for next steps.	.40	264.00
Sraders, S.	8/11/22	Research re Issue #34.	4.60	3,036.00
Turner, C.	8/11/22	Confer with team re strategy and case updates.	.40	80.00
Hubbard, B.	8/11/22	Confer with team re status and strategy.	.40	170.00
Huddleston, D.	8/11/22	Confer with team re case status and strategy.	.40	168.00
Agwu, I.	8/11/22	Confer with team re case update.	.40	168.00
Agwu, I.	8/11/22	Continue reviewing R. O'Connor deposition transcript (1.5); continue drafting summary of same (1.1).	2.60	1,092.00
Poz, N.	8/11/22	Confer with team re case status and next steps.	.40	130.00
Poz, N.	8/11/22	Continue review and identification of insurance policies for inclusion in database for further analysis.	2.70	877.50
Shore, R.	8/12/22	Analysis re Issues #27 and #32 and alternative methods of proof (1.0); analyze litigation issues (1.0).	2.00	2,900.00
Girgenti, J.	8/12/22	Communicate with D. Huddleston and J. Sanchez re review of third-party subpoena documents.	.10	36.50
Rubinstein, J.	8/12/22	Review proposed edits to revised scheduling order (0.4); communicate with co-counsel and insurer counsel re same (0.2); review significant documents identified by review team re Debtors' and Marsh depositions (1.2); communicate with co-counsel re deposition preparation (0.4); review discovery correspondence from K. Nolley (0.4); review historic deposition transcript (0.7).	3.30	2,805.00

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Sanchez, J.	8/12/22	Review insurance policy language for insurance recovery.	1.80	855.00
Rush, M.	8/12/22	Review documents identified as responsive in preparation for Debtors' depositions.	3.20	2,240.00
Martinez, S.	8/12/22	Finalize review and organize Marsh Rule 30(b)(6) materials.	.70	227.50
Martinez, S.	8/12/22	Review databases re materials produced by Debtors.	.30	97.50
Leveridge, R.	8/12/22	Communicate with team re document review.	.40	580.00
Sraders, S.	8/12/22	Revise memorandum re Issue #34.	7.00	4,620.00
Huddleston, D.	8/12/22	Communicate with J. Sanchez and J. Girgenti re document review.	.20	84.00
Poz, N.	8/12/22	Continue to review and identify insurance policies for inclusion in database for further analysis.	.60	195.00
Shore, R.	8/14/22	Continue analysis of Issues #27 and #32 options.	1.00	1,450.00
Rubinstein, J.	8/14/22	Complete review of historic deposition transcript.	.70	595.00
Shore, R.	8/15/22	Confer with R. Leveridge and J. Rubinstein re litigation strategy (1.0); review revisions to correspondence re Issue #27 and upcoming deposition outline (0.4); review letter to Court re joint proposed modified CMO (0.5); review and revise Issue #34 memorandum (3.1); analyze other litigation issues and correspondence (0.3).	5.30	7,685.00
Girgenti, J.	8/15/22	Confer with J. Sanchez and D. Huddleston re review of third-party subpoena documents and related issues.	.30	109.50
Girgenti, J.	8/15/22	Continue reviewing deposition documents.	2.80	1,022.00
Rubinstein, J.	8/15/22	Confer with R. Shore and R. Leveridge re strategy and open projects (1.0); review documents in preparation for multiple upcoming depositions (1.1); correspond with insurer counsel re submission of proposed scheduling order (0.2); review correspondence re policy analysis (0.2); analyze legal memorandum re Issue #34 (1.9); analysis re policy stipulation project in advance of call with AGILC/Steadfast counsel (0.6); proof of claim analysis (0.2); begin review of J. Lowne Rule 30(b)(6) deposition re errata (0.7); revise draft letter to Court re amended scheduling and pre-trial order (0.8); correspond with co-counsel re same (0.1).	6.80	5,780.00
Sanchez, J.	8/15/22	Revise policy language analysis chart.	2.60	1,235.00
Sanchez, J.	8/15/22	Confer with D. Huddleston and J. Girgenti re third-party document productions.	.30	142.50
Rush, M.	8/15/22	Create parameters for QC of Marsh documents.	1.00	700.00

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Name	Date	Services	Hours	Amount
Rush, M.	8/15/22	Review documents in preparation for insurer depositions (2.0); draft outline for same (1.7).	3.70	2,590.00
Martinez, S.	8/15/22	Review and finalize Marsh Rule 30(b)(6) witness preparation materials.	1.30	422.50
Gaske, A.	8/15/22	Review third-party subpoenas.	.40	244.00
Gaske, A.	8/15/22	Analyze policy evidence re Insurer #36.	2.00	1,220.00
Gaske, A.	8/15/22	Analyze letter from insurers re Rule 30(b)(6) deposition notice.	.30	183.00
Leveridge, R.	8/15/22	Review planning document prepared by J. Rubinstein (0.4); confer with R. Shore and J. Rubinstein re same and other litigation planning issues (1.0).	1.40	2,030.00
Leveridge, R.	8/15/22	Communicate with team re experts.	.60	870.00
Leveridge, R.	8/15/22	Review communication from insurer counsel re Debtors' Rule 30(b)(6) deposition (0.5); review communications with insurers re offensive discovery from insurers (0.5); review legal research re deposition issue (0.7).	1.70	2,465.00
Leveridge, R.	8/15/22	Review legal research re Issue #34.	.90	1,305.00
Sraders, S.	8/15/22	Correspond with J. Rubinstein and J. Sanchez re Issue #34.	.70	462.00
Turner, C.	8/15/22	Review insurer letter to plaintiffs.	.20	40.00
Turner, C.	8/15/22	Review and finalize Marsh Rule 30(b)(6) witness materials.	2.80	560.00
Turner, C.	8/15/22	Review subpoenas for FDA and Publicis Health.	.40	80.00
Huddleston, D.	8/15/22	Confer with J. Girgenti and J. Sanchez re review of third-party subpoena documents.	.30	126.00
Poz, N.	8/15/22	Continue reviewing and identifying insurance policies for inclusion in database for further analysis.	.30	97.50
Poz, N.	8/15/22	Research joint status report to assist in drafting joint communication to Court re extension of scheduling order.	.20	65.00
Shore, R.	8/16/22	Confer with J. Rubinstein and A. Gaske re policy stipulations for missing policies (0.6); analysis re litigation status and strategy (2.4); review memorandum from co-counsel re Issue #34 (2.5).	5.50	7,975.00
Girgenti, J.	8/16/22	Continue review of deposition documents.	2.70	985.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	8/16/22	Communicate with co-counsel and insurer counsel re proposed amended scheduling order and accompanying letter to court (1.1); correspond with team re historic depositions transcripts of Debtors' employees (0.3); revise draft expert retention letter (0.2); confer with S. Sraders re expert-related issues (0.6); review potentially relevant expert report (0.5); analysis re Steadfast and AGILC policy stipulation (1.2); confer with insurer counsel and A. Gaske re same (0.3); confer with R. Shore and A. Gaske re Steadfast policy stipulation (0.6).	4.80	4,080.00
Sanchez, J.	8/16/22	Revise policy language analysis chart.	2.00	950.00
Sanchez, J.	8/16/22	Review third-party documents in preparation for depositions.	2.00	950.00
Rush, M.	8/16/22	Review revisions to insurers' proposed letter to Court re scheduling order.	.10	70.00
Rush, M.	8/16/22	Continue reviewing documents for insurer depositions (2.7); continue drafting outline for same (3.0).	5.70	3,990.00
Bonesteel, A.	8/16/22	Review and log incoming productions.	1.40	525.00
Gaske, A.	8/16/22	Confer with counsel for American Guarantee, Steadfast and J. Rubinstein re policy stipulation.	.30	183.00
Gaske, A.	8/16/22	Review policy evidence re Insurer #36 policy (2.0); confer with R. Shore and J. Rubinstein re policy stipulation as to Steadfast (0.6).	2.60	1,586.00
Gaske, A.	8/16/22	Analyze AGLIC comments to policy comparison spreadsheet.	1.40	854.00
Leveridge, R.	8/16/22	Review legal research memorandum from Reed Smith.	1.10	1,595.00
Leveridge, R.	8/16/22	Draft communication to expert.	.80	1,160.00
Leveridge, R.	8/16/22	Review comments from insurers and co-counsel to letter to Judge Lane re proposed revised CMO.	.60	870.00
Sraders, S.	8/16/22	Confer with J. Rubinstein re recent developments and strategy for next steps.	.60	396.00
Sraders, S.	8/16/22	Analysis re Issue #34.	.90	594.00
Sraders, S.	8/16/22	Analyze policy information re Insurer #36 policy.	.30	198.00
Sraders, S.	8/16/22	Analyze documents for upcoming deposition.	.90	594.00
Turner, C.	8/16/22	Review and finalize Marsh Rule 30(b)(6) witness materials.	2.90	580.00
Huddleston, D.	8/16/22	Review and tag third-party subpoena documents.	2.50	1,050.00
Shore, R.	8/17/22	Attend omnibus hearing (1.5); finalize reviewing and revising Issue #34 memorandum (1.0).	2.50	3,625.00
Girgenti, J.	8/17/22	Review and code documents produced by the FDA.	3.40	1,241.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	8/17/22	Communicate with M. Rush re Liberty deposition logistics (0.2); review correspondence re letter/scheduling order submission to Court (0.3); correspond with team re multiple projects re discovery and policy stipulations (0.5).	1.00	850.00
Sanchez, J.	8/17/22	Revise policy language analysis review.	2.20	1,045.00
Rush, M.	8/17/22	Continue reviewing documents for upcoming deposition (2.2); continue drafting outline for same (1.8).	4.00	2,800.00
Rush, M.	8/17/22	Review MDL abatement order.	1.10	770.00
Rush, M.	8/17/22	Review letter from J. Davis re discovery issues.	.20	140.00
Gaske, A.	8/17/22	Complete analysis of AGLIC comments to policy comparison spreadsheet.	.50	305.00
Gaske, A.	8/17/22	Confer with Consulting Expert A re policy evidence.	.20	122.00
Gaske, A.	8/17/22	Analyze policy evidence for Steadfast.	2.20	1,342.00
Gaske, A.	8/17/22	Review recent opioid-related decisions.	.70	427.00
Leveridge, R.	8/17/22	Attend omnibus hearing.	1.50	2,175.00
Leveridge, R.	8/17/22	Analysis of discovery issues.	.90	1,305.00
Leveridge, R.	8/17/22	Communicate with team re Issue #34.	.60	870.00
Leveridge, R.	8/17/22	Review letter from opposing counsel to Court re revised CMO.	.30	435.00
Leveridge, R.	8/17/22	Communicate with expert re retention terms.	.40	580.00
Ogrey, S.	8/17/22	Draft notice of deposition for G. Paolino.	2.90	696.00
Sraders, S.	8/17/22	Correspond with B. Hubbard re analysis of proofs of claim.	.20	132.00
Sraders, S.	8/17/22	Review correspondence from G. DiSpirito.	.10	66.00
Sraders, S.	8/17/22	Analyze insurance policies re Issue #34.	2.30	1,518.00
Turner, C.	8/17/22	Review and organize materials for upcoming deposition.	1.00	200.00
Hubbard, B.	8/17/22	Review personal injury proof of claim data.	1.60	680.00
Huddleston, D.	8/17/22	Review third-party subpoena documents.	.40	168.00
Poz, N.	8/17/22	Review drafts of deposition documents re G. Paolino for compliance with local rules and Federal Rules of Procedure.	.40	130.00
Shore, R.	8/18/22	Confer with J. Rubinstein and A. Gaske re policy stipulations (0.7); confer with team re Issue #34 (1.0); confer with team re case status (0.6); confer with co-counsel re deposition preparation and issues (1.2).	3.50	5,075.00
Girgenti, J.	8/18/22	Confer with team re litigation update.	.60	219.00

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Girgenti, J.	8/18/22	Continue reviewing and coding documents produced by the FDA.	3.80	1,387.00
Rubinstein, J.	8/18/22	Communications with co-counsel re deposition preparation (0.2); confer with team re Issue #34 (1.0); confer with team re tasks and strategy (0.6); confer with R. Shore and A. Gaske re policy stipulation (0.7); confer with co-counsel re deposition preparation and other strategic issues (1.2); confer with team re deposition preparation (0.8).	4.50	3,825.00
Rush, M.	8/18/22	Confer with team re case status and strategy.	.60	420.00
Rush, M.	8/18/22	Confer with co-counsel re deposition preparation issues.	1.20	840.00
Martinez, S.	8/18/22	Confer with team re case status.	.60	195.00
Bonesteel, A.	8/18/22	Confer with team re case status and strategy.	.60	225.00
Gaske, A.	8/18/22	Complete review of AGLIC policy comparison spreadsheet edits (0.3); confer with R. Shore and J. Rubinstein re same (0.7).	1.00	610.00
Gaske, A.	8/18/22	Confer with team re litigation strategy and next steps.	.60	366.00
Gaske, A.	8/18/22	Research deposition preparation issues.	3.60	2,196.00
Gaske, A.	8/18/22	Review status of responses re Rule 30(b)(1) deponents.	.20	122.00
Leveridge, R.	8/18/22	Review memorandum re Issue #34.	1.70	2,465.00
Leveridge, R.	8/18/22	Review materials re upcoming deposition (0.2); confer with co-counsel re same (1.2).	1.40	2,030.00
Leveridge, R.	8/18/22	Confer with team re case status and strategy.	.60	870.00
Ogrey, S.	8/18/22	Revise G. Paolino notice of deposition.	.30	72.00
Sraders, S.	8/18/22	Confer with team re recent developments and strategy for next steps.	.60	396.00
Sraders, S.	8/18/22	Analyze case law and policy language re Issue #34.	1.40	924.00
Sraders, S.	8/18/22	Confer with R. Shore, R. Leveridge and J. Rubinstein re Issue #34.	1.00	660.00
Turner, C.	8/18/22	Confer with team re litigation strategy and case updates.	.60	120.00
Huddleston, D.	8/18/22	Communicate with J. Rubinstein and J. Girgenti re status of review and tagging third-party subpoenas documents.	.20	84.00
Agwu, I.	8/18/22	Confer with team re case status and strategy.	.60	252.00
Poz, N.	8/18/22	Confer with team re case status and next steps.	.60	195.00
Shore, R.	8/19/22	Analysis re privilege issue.	.50	725.00

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Name	Date	Services	Hours	Amount
Rubinstein, J.	8/19/22	Review production correspondence (0.1); analysis re defensive depositions (1.9); review summary of legal research re discovery issue (0.3); review specific documents identified from third-party productions (0.3); correspond with team re responses to pending discovery correspondence (0.2); analysis re Issue #34 (0.2).	3.00	2,550.00
Bonesteel, A.	8/19/22	Review and log incoming productions.	.80	300.00
Gaske, A.	8/19/22	Research re attorney-client privilege and work-product doctrine (2.9); draft summary of same (1.4).	4.30	2,623.00
Sraders, S.	8/19/22	Revise memorandum re Issue #34.	.20	132.00
Shore, R.	8/21/22	Review and revise trial plan (1.2); review Issue #34 memos (0.6); review and comment on A. Gaske note re privilege (0.5); review J. Rubinstein comments re same (0.3); review insurer correspondence re deferred discovery requests and Rule 30(b)(6) deposition request on remaining topics (0.4); review revised Issue #34 memorandum (1.0).	4.00	5,800.00
Rubinstein, J.	8/21/22	Complete review of Debtors' Rule 30(b)(6) deposition transcript re topics 1-6 re insurance issues (4.5); correspond with co-counsel re same (0.7).	5.20	4,420.00
Sraders, S.	8/21/22	Revise memorandum re Issue #34.	3.90	2,574.00
Shore, R.	8/22/22	Confer with R. Leveridge and J. Rubinstein re status, strategy, next steps.	.60	870.00
Shore, R.	8/22/22	Draft trial plan (3.7); review Issue #34 memorandum (1.3).	5.00	7,250.00
Rubinstein, J.	8/22/22	Confer with R. Shore and R. Leveridge re strategy (0.6); correspond with R. Shore and R. Leveridge re multiple ongoing projects (0.3).	.90	765.00
Rush, M.	8/22/22	Revise deposition outline.	.50	350.00
Gaske, A.	8/22/22	Research re privilege issue.	2.60	1,586.00
Gaske, A.	8/22/22	Research policy evidence re Insurer #36.	2.30	1,403.00
Gaske, A.	8/22/22	Review documents produced by Insurers #15 and #28 re policy stipulation evidence.	1.10	671.00
Leveridge, R.	8/22/22	Analyze expert retention issues (1.2); communicate with co-counsel re same (0.4).	1.60	2,320.00
Leveridge, R.	8/22/22	Confer with R. Shore and J. Rubinstein re litigation strategy.	.60	870.00
Leveridge, R.	8/22/22	Communicate with co-counsel re discovery issues and other matters relevant to litigation (0.3); review material re same (0.9).	1.20	1,740.00
Sraders, S.	8/22/22	Revise memorandum re Issue #34	.40	264.00

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Name	Date	Services	Hours	Amount
Sraders, S.	8/22/22	Review status of expert retentions.	.30	198.00
Shore, R.	8/23/22	Confer with other plaintiffs' counsel re various litigation issues.	1.10	1,595.00
Rubinstein, J.	8/23/22	Communicate with team re deposition scheduling (0.2); review signed order re revised case management schedule (0.1); participate in call with co-counsel re strategy (1.1).	1.40	1,190.00
Rush, M.	8/23/22	Confer with plaintiffs' counsel group re responses to insurers' letters.	1.10	770.00
Gaske, A.	8/23/22	Confer with co-plaintiffs re case strategy.	1.10	671.00
Gaske, A.	8/23/22	Research federal rules re deposition notices.	1.60	976.00
Leveridge, R.	8/23/22	Participate in meeting with co-counsel re insurer letters.	1.10	1,595.00
Leveridge, R.	8/23/22	Communicate with expert and co-counsel re retention.	.80	1,160.00
Ogrey, S.	8/23/22	Finalize notice of deposition for G. Paolino.	.80	192.00
Sraders, S.	8/23/22	Analyze policy language re Issue #34.	.30	198.00
Sraders, S.	8/23/22	Draft deposition outline for Rule 30(b)(1) witness.	3.10	2,046.00
Turner, C.	8/23/22	Review and organize materials for Rule 30(b)(1) witness.	.70	140.00
Poz, N.	8/23/22	Communicate with S. Ogrey and C. Turner re service of process for notice of fact witness deposition.	.20	65.00
Shore, R.	8/24/22	Review correspondence re various litigation issues (0.8); draft trial outline (3.2); analyze issues re same (1.0).	5.00	7,250.00
Rubinstein, J.	8/24/22	Communicate with team re offensive deposition scheduling.	.20	170.00
Rush, M.	8/24/22	Continue drafting outline for upcoming deposition.	1.90	1,330.00
Gaske, A.	8/24/22	Correspond with insurer re status of scheduling Rule 30(b)(1) depositions.	.10	61.00
Gaske, A.	8/24/22	Continue research re privilege issue.	2.40	1,464.00
Leveridge, R.	8/24/22	Communication with expert re status.	.30	435.00
Turner, C.	8/24/22	Update case calendar re amended scheduling and pre-trial order.	2.00	400.00
Shore, R.	8/25/22	Continue drafting trial plan.	2.00	2,900.00
Shore, R.	8/25/22	Confer with team re case status and next steps (0.5); review status of preparation for W. Chang deposition (0.3); confer with R. Leveridge re strategy (0.9).	1.70	2,465.00
Girgenti, J.	8/25/22	Confer with team re case update.	.50	182.50

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Name	Date	Services	Hours	Amount
Rubinstein, J.	8/25/22	Communications with co-counsel re discovery issues (0.7); communicate with team re deposition scheduling and preparation (0.6); review recent opioid-related decision (0.7).	2.00	1,700.00
Sanchez, J.	8/25/22	Confer with team re case status.	.50	237.50
Rush, M.	8/25/22	Review documents for insurer depositions (2.7); draft outline re same (1.9).	4.60	3,220.00
Rush, M.	8/25/22	Confer with A. Gaske and S. Sraders re insurer depositions.	.30	210.00
Rush, M.	8/25/22	Confer with team re case status and strategy.	.50	350.00
Martinez, S.	8/25/22	Confer with team re case status and strategy.	.50	162.50
Gaske, A.	8/25/22	Confer with M. Rush and S. Sraders re deposition preparation.	.30	183.00
Gaske, A.	8/25/22	Confer with team re litigation strategy and case updates.	.50	305.00
Gaske, A.	8/25/22	Draft status of assignment re policy provisions (0.3); correspond with insurer re Rule 30(b)(1) status (0.2).	.50	305.00
Leveridge, R.	8/25/22	Confer with R. Shore re strategic issues.	.90	1,305.00
Leveridge, R.	8/25/22	Communications with co-counsel re discovery issues.	.80	1,160.00
Leveridge, R.	8/25/22	Review status of pending projects (0.3); confer with team re case status and strategy (0.5).	.80	1,160.00
Farra, A.	8/25/22	Confer with team re litigation status update.	.50	355.00
Sraders, S.	8/25/22	Confer with M. Rush and A. Gaske re deposition preparation.	.30	198.00
Sraders, S.	8/25/22	Correspond with counsel for Zurich and National Union re depositions.	.30	198.00
Sraders, S.	8/25/22	Confer with team re recent developments and strategy for next steps.	.50	330.00
Turner, C.	8/25/22	Confer with team re strategy and case updates.	.50	100.00
Huddleston, D.	8/25/22	Confer with team re case status and strategy.	.50	210.00
Huddleston, D.	8/25/22	Review third-party subpoena documents to confirm document tags.	.70	294.00
Agwu, I.	8/25/22	Confer with team re case update.	.50	210.00
Poz, N.	8/25/22	Confer with team re case status and next steps.	.50	162.50
Shore, R.	8/26/22	Continue drafting trial plan (3.8); review memorandum re Issue #34 (1.2).	5.00	7,250.00
Rubinstein, J.	8/26/22	Review various memoranda analyzing Issue #34 (1.2); communication with co-counsel re errata sheet (0.1); analysis of documents in preparation for upcoming depositions (0.8).	2.10	1,785.00

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Name	Date	Services	Hours	Amount
Gaske, A.	8/26/22	Revise policy language spreadsheet.	1.90	1,159.00
Leveridge, R.	8/26/22	Review and comment on strategic plan for case.	1.20	1,740.00
Turner, C.	8/26/22	Review and organize J. Lowne errata sheet.	.20	40.00
Turner, C.	8/26/22	Review and finalize materials for upcoming deposition.	5.60	1,120.00
Rubinstein, J.	8/28/22	Correspond with co-counsel re defensive deposition preparation.	.20	170.00
Shore, R.	8/29/22	Confer with R. Leveridge and J. Rubinstein re case strategy.	.70	1,015.00
Shore, R.	8/29/22	Review and revise Issue #34 memorandum.	6.10	8,845.00
Rubinstein, J.	8/29/22	Confer with R. Shore and R. Leveridge re open tasks and strategy (0.7); confer with A. Gaske re deposition preparation (0.2); review select documents for deposition preparation (1.4); communicate with team re deposition scheduling (0.3).	2.60	2,210.00
Rush, M.	8/29/22	Continue reviewing documents in preparation for insurer depositions (2.2); continue drafting outline for same (2.1).	4.30	3,010.00
Rush, M.	8/29/22	Review deposition notice for L. Schultz.	.10	70.00
Rush, M.	8/29/22	Communicate with R. Leveridge and J. Rubinstein re deposition scheduling.	.30	210.00
Rush, M.	8/29/22	Review documents for Marsh deposition.	.40	280.00
Rush, M.	8/29/22	Communicate with co-plaintiffs' counsel re deposition notices.	.10	70.00
Martinez, S.	8/29/22	Review and organize Marsh Rule 30(b)(6) deposition preparation materials.	.20	65.00
Bonesteel, A.	8/29/22	Organize J. Lowne deposition materials for attorney analysis.	.50	187.50
Gaske, A.	8/29/22	Confer with J. Rubinstein re deposition preparation.	.20	122.00
Gaske, A.	8/29/22	Review policy evidence for Insurer #36 and next steps.	.90	549.00
Gaske, A.	8/29/22	Correspond with insurers re status of policy stipulation (0.2); review hot documents re deposition preparation (1.9).	2.10	1,281.00
Leveridge, R.	8/29/22	Communicate with co-counsel re discovery and depositions.	.70	1,015.00
Leveridge, R.	8/29/22	Confer with R. Shore and J. Rubinstein re litigation strategy.	.70	1,015.00
Ogrey, S.	8/29/22	Draft notice of deposition to L. Schultz.	.50	120.00
Poz, N.	8/29/22	Research documents in preparation for upcoming deposition.	.90	292.50

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Name	Date	Services	Hours	Amount
Poz, N.	8/29/22	Update case calendar re deposition of L. Schultz.	.10	32.50
Shore, R.	8/30/22	Continue revising memorandum re Issue #34.	1.00	1,450.00
Rubinstein, J.	8/30/22	Meet with co-counsel re deposition preparation.	7.50	6,375.00
Rush, M.	8/30/22	Confer with plaintiffs' counsel re deposition preparation (partial).	6.00	4,200.00
Rush, M.	8/30/22	Draft outline for insurer depositions.	1.00	700.00
Bonesteel, A.	8/30/22	Review materials for upcoming deposition.	.30	112.50
Gaske, A.	8/30/22	Attend deposition preparation session.	7.50	4,575.00
Leveridge, R.	8/30/22	Participate in deposition preparation (partial).	2.80	4,060.00
Ogrey, S.	8/30/22	Continue drafting notice of deposition to L. Schultz.	1.00	240.00
Turner, C.	8/30/22	Review and finalize Marsh Rule 30(b)(6) materials.	2.70	540.00
Turner, C.	8/30/22	Review and organize latest documents for upcoming deposition.	.20	40.00
Turner, C.	8/30/22	Review materials for upcoming depositions.	.10	20.00
Turner, C.	8/30/22	Review 30(b)(1) deposition tracking.	.20	40.00
Poz, N.	8/30/22	Update fact witness depositions tracking chart.	.50	162.50
Shore, R.	8/31/22	Review Issue #27 brief (0.8); communicate with team re revisions to same (0.3); review Reed Smith Issue #34 memo (0.3); review and revise Issue #34 memorandum (0.5); confer with J. Rubinstein and A. Gaske re XLIA stipulation (0.6).	2.50	3,625.00
Rubinstein, J.	8/31/22	Review correspondence re case developments (2.0); analyze proposed edits to policy stipulation provided by XLIA (0.6); confer with R. Shore and A. Gaske re same (0.6); review policy language analysis (0.5); revise offensive deposition outline re Liberty Rule 30(b)(1) deponent (0.3).	4.00	3,400.00
Rush, M.	8/31/22	Draft outline for insurer depositions.	1.80	1,260.00
Rush, M.	8/31/22	Review documents in preparation for Marsh Rule 30(b)(6) deposition.	4.40	3,080.00
Martinez, S.	8/31/22	Confer with A. Bonesteel re database.	.20	65.00
Bonesteel, A.	8/31/22	Download deposition preparation materials for attorney review.	.40	150.00
Gaske, A.	8/31/22	Analyze XLIA revisions to proposed policy stipulation (0.7); confer with R. Shore and J. Rubinstein re XLIA policy stipulation revisions (0.6).	1.30	793.00
Gaske, A.	8/31/22	Research re Issue #27.	1.70	1,037.00
Gaske, A.	8/31/22	Review dates of certain discovery requests.	.20	122.00
Leveridge, R.	8/31/22	Communicate with co-counsel re discovery matters (0.3); review draft response to insurers' discovery letter (1.6).	1.90	2,755.00

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Name	Date	Services	Hours	Amount
Ogrey, S.	8/31/22	Continue drafting notices of deposition for L. Schultz and S. Gough.	.30	72.00
Sraders, S.	8/31/22	Review correspondence re Rule 30(b)(6) depositions.	.10	66.00
Turner, C.	8/31/22	Continue reviewing materials for upcoming depositions.	1.10	220.00
Turner, C.	8/31/22	Review and organize Marsh Rule 30(b)(6) documents.	1.10	220.00
Turner, C.	8/31/22	Review and organize Navigators request to produce.	.10	20.00
Turner, C.	8/31/22	Review and organize third-party subpoenas.	.30	60.00
Project Total:			619.60	\$ 462,142.00

TOTAL CHARGEABLE HOURS 654.20

TOTAL FEES \$ 492,740.00

TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	12.80	1,800.00	23,040.00
Shore, R.	75.20	1,450.00	109,040.00
Girgenti, J.	23.00	365.00	8,395.00
Rubinstein, J.	11.60	425.00	4,930.00
Rubinstein, J.	93.30	850.00	79,305.00
Sanchez, J.	28.40	475.00	13,490.00
Rush, M.	76.50	700.00	53,550.00
Martinez, S.	7.20	325.00	2,340.00
Bonesteel, A.	8.50	375.00	3,187.50
Gaske, A.	5.60	305.00	1,708.00
Gaske, A.	77.00	610.00	46,970.00
Leveridge, R.	41.50	1,450.00	60,175.00
Ogrey, S.	5.80	240.00	1,392.00
Farra, A.	9.00	710.00	6,390.00
Sraders, S.	48.60	660.00	32,076.00
Turner, C.	29.40	200.00	5,880.00
Hubbard, B.	5.40	425.00	2,295.00
Huddleston, D.	32.30	420.00	13,566.00
Agwu, I.	47.40	420.00	19,908.00
Poz, N.	15.70	325.00	5,102.50
TOTALS	654.20		\$ 492,740.00

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TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	4.60	920.00
A009	Meetings / Communications with AHC & Creditors	4.80	8,640.00
A015	Non-Working Travel (Billed @ 50%)	17.20	6,638.00
A019	Plan of Reorganization / Disclosure Statement	8.00	14,400.00
A020	Insurance Adversary Proceeding	619.60	462,142.00

EXPENSE DETAILS

E110: Out-of-Town Travel

Date	Description	Task	Amount
7/21/22	Travel - Train Fare / Sarah Sraders / Travel (roundtrip) from Washington, DC to Stamford, CT / Attend J. Lowne Deposition / July 20-21, 2022	E110	448.00
7/21/22	Travel - Taxi Fare / Sarah Sraders / Travel from Washington, DC to Stamford, CT / Attend J. Lowne Deposition / July 20-21, 2022 (to/from train station)	E110	100.68
8/29/22	Travel - Mileage / Jason Rubinstein / Travel from Potomac, MD to Stamford, CT / Attend deposition preparation with co-counsel / Aug. 29-30, 2022 (328 miles @ \$0.625/mile)	E110	205.00
8/29/22	Travel - Meals / Jason Rubinstein / Stamford, CT / Attend deposition preparation with co-counsel / Aug. 29-30, 2022	E110	17.73
8/30/22	Travel - Train Fare / Alison Gaske / Travel (roundtrip) from Washington, DC to Stamford, CT / Purdue Deposition Prep / 08.30-31.2022	E110	448.00
8/30/22	Travel - Mileage / Jason Rubinstein / Travel from Stamford, CT to Potomac, MD / After deposition preparation with co-counsel / Aug. 29-30, 2022 (319 miles @ \$0.625/mile)	E110	199.38
8/30/22	Travel - Tolls / Jason Rubinstein / Travel from Potomac, MD to Washington, DC / Attend deposition preparation with co-counsel / Aug. 29-30, 2022	E110	6.61
8/30/22	Travel - Parking / Alison Gaske / Travel from Washington, DC to Stamford, CT / Purdue Deposition Prep / 08.30-31.2022 (train station parking)	E110	50.00
8/30/22	Travel - Parking / Jason Rubinstein / Stamford, CT / Attend deposition preparation with co-counsel / Aug. 29-30, 2022 (hotel parking in Stamford, CT)	E110	15.95
8/30/22	Travel - Lodging / Jason Rubinstein / Stamford, CT / Attend deposition preparation with co-counsel / Aug. 29-30, 2022	E110	303.60
8/30/22	Travel - Meals / Jason Rubinstein / Stamford, CT / Attend deposition preparation with co-counsel / Aug. 29-30, 2022	E110	24.14
Sub-Total of Expenses:			\$ 1,819.09

TOTAL EXPENSES

\$ 1,819.09

TOTAL FEES AND EXPENSES

\$ 494,559.09